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November 30, 2022

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of October 4, 2022, ECF No. 8600, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs" or "PECs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

At the request of Plaintiffs' counsel, on October 14, 2022, counsel for Plaintiffs, the FBI, and Saudi Arabia met and conferred to discuss the status of redactions to date and to develop a more streamlined process for handling redaction projects going forward. This included discussing whether to prioritize certain litigation material for review and the strategy for re-reviewing documents in light of Executive Order 14040. As discussed at that meeting, counsel for Saudi Arabia subsequently provided Plaintiffs with a list of sealed filings and the status of the parties' review and provided the FBI with a list of depositions containing or potentially containing FBI protected material.

On November 23, 2022, Saudi Arabia circulated revised proposals for FBI redactions to Saudi Arabia's filings associated with the Court's July 20, 2020, August 11, 2020, and October 2, 2020 orders. The revisions to FBI redactions propose removing redactions of materials that were publicly released pursuant to section 2 of Executive Order 14040.

On November 28, 2022, Plaintiffs circulated responses to the FBI redactions suggested by Saudi Arabia and circulated on July 22, September 9, September 23, and September 29, 2022. Plaintiffs are continuing to review additional materials and anticipate circulating responses on a rolling basis.

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The FBI has now completed its review of all but one of the Plaintiffs' expert reports; it expects to complete its review of the final report shortly.

Dallah Avco informed the parties that it takes no position on the proposed redactions circulated on November 23, 2022, or on Plaintiff's responses circulated on November 28, 2022.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before January 31, 2023.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)